

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN, and KIMBERLY ALLEN on  
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL\*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; and SIERRA-CEDAR, INC., a foreign corporation,

DEFENDANTS.

**Case No. 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY,  
AND INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

---

**PLAINTIFFS' UNOPPOSED MOTION AND SUPPORTING MEMORANDUM FOR  
EXTENSION OF TIME TO RESPOND TO DEFENDANT GLOBAL TEL\*LINK  
CORPORATION'S MOTION TO DISMISS PLAINTIFFS' FIFTH AMENDED  
COMPLAINT**

---

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, on behalf themselves and all similarly situated persons (hereinafter "the Plaintiffs"), by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 6 and 12 hereby move this Court to extend their time to respond to the Motion to Dismiss Plaintiffs' Fifth Amended Complaint (ECF No. 178) filed by Defendant Global Tel\*Link Corporation (hereinafter "GTL"). In support of their Motion, Plaintiffs state as follows:

**MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION**

1. Plaintiffs' deadline to respond to GTL's Motion to Dismiss (ECF No. 178) is April 9, 2019.
2. This is a complex class action lawsuit filed on behalf of the Plaintiffs.
3. As the aforementioned motions are potentially dispositive, Plaintiffs require additional time to properly and thoroughly research and brief the issues raised by GTL.
4. Further, Defendant Sierra-Cedar, Inc. has alleged comparative fault against a non-party in its "Answer to Plaintiffs' Fifth Amended Class Action Complaint," and Plaintiffs anticipate filing an amended complaint naming Sierra Systems Group, Inc. as a new defendant, thereby rendering GTL's Motion to Dismiss moot.
5. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Plaintiffs consulted with counsel for GTL regarding this requested extension.
6. Counsel for GTL has not responded.

7. A proposed Order granting this Motion will be e-mailed to the Court for its consideration.

Therefore, Plaintiffs respectfully request that the Court extend their time to respond to GTL's Motion to Dismiss (ECF No. 178) the Fifth Amended Complaint by two weeks, or until April 23, 2019.

Respectfully submitted,

*/s/ William E. Cochran, Jr.* \_\_\_\_\_

Michael G. McLaren (#5100)

William E. Cochran, Jr. (#21428)

Brice M. Timmons (#29582)

BLACK McLAREN JONES RYLAND & GRIFFEE PC

530 Oak Court Drive, Suite 360

Memphis, TN 38117

(901) 762-0535 (Office)

(901) 762-0539 ( Fax)

[mclaren@blackmclaw.com](mailto:mclaren@blackmclaw.com)

[wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com)

[btimmons@blackmclaw.com](mailto:btimmons@blackmclaw.com)

*Counsel for Plaintiffs and the putative Class  
Members*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of April, 2019, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

Robert E. Craddock, Esq.  
Odell Horton, Jr., Esq.  
WYATT, TARRANT & COMBS, LLP  
1715 Aaron Brenner Drive, Suite 800  
Memphis, Tennessee 38120  
(901) 537-1000  
Email: rcraddock@wyattfirm.com  
Email: ohorton@wyattfirm.com

Emmett Lee Whitwell, Esq.  
SHELBY COUNTY ATTORNEY'S OFFICE  
160 N. Main Street  
Suite 950  
Memphis, TN 38103  
(901) 222-2100  
Email: lee.whitwell@shelbycountyttn.gov

*Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee*

*Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
(901) 577-2121  
Email: btrammell@bakerdonelson.com

Beth Bivans Petronio, Esq.  
K&L GATES, LLP  
1717 Main Street  
Suite 2800  
Dallas, Texas 75201  
(214) 939-5815  
Email: beth.petronio@klgates.com

*Counsel for Defendant Tyler Technologies, Inc.*

*Counsel for Defendant Tyler Technologies, Inc.*

Douglas F. Halijan  
William David Irvine  
BURCH PORTER & JOHNSON  
130 N. Court Avenue  
Memphis, TN 38103-2217  
(901) 524-5000  
Email: dhalijan@bpjlaw.com  
Email: wirvine@bpjlaw.com

Russell Brandon Bundren  
James L. Murphy  
BRADLEY ARANT BOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
(615) 252-4647  
Email: bbundren@babco.com  
Email: jmurphy@bradley.com

*Counsel for Defendant Software AG Cloud Americas, Inc.*

*Counsel for Defendant Global TelLink Corporation*

Albert G. McLean  
Kevin David Bernstein  
SPICER RUDSTROM PLLC  
119 S. Main Street, Suite 700  
Memphis, TN 38103  
901-522-2324  
Email: amclean@spicerfirm.com  
Email: kdb@spicerfirm.com

*Counsel for Defendant Sierra-Cedar, Inc.*

/s/ William E. Cochran, Jr.